

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Michigan

United States of America  
v.

Jesse Theodore McFadden,

Case No. 20-mc-30180

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 17, 2020 in the county of Bay in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section*  
18 U.S.C. § 922(g)(1)

*Offense Description*  
Felon in Possession of a Firearm

This criminal complaint is based on these facts:

That on or about May 17, 2020, in the Eastern District of Michigan, JESSE MCFADDEN, knowing that he had been convicted of a felony offense punishable by a term of imprisonment exceeding one year, knowingly possessed, in and affecting commerce, a firearm in violation of 18 U.S.C. § 922(g)(1).


☒ Continued on the attached sheet.

Sworn to before me and signed in my presence.

Date: May 20, 2020

City and state: Bay City, MI

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Complainant's signature  
Travis Forfinski, Special Agent, United States Coast Guard  
Printed name and title

  
Judge's signature  
Patricia T. Morris, U.S. Magistrate Judge  
Printed name and title

**AFFIDAVIT**

1. I am a Special Agent with the U.S. Coast Guard Investigative Service (CGIS), assigned to the Detroit, Michigan, Resident Office. I have been employed with the Coast Guard since June 2000 and a Special Agent with the CGIS since June 2009. As a Special Agent, I have conducted or participated in numerous criminal investigations focused on violations of federal law.

2. I make this affidavit from personal knowledge based on my participation in this investigation, my review of reports and other materials prepared by those who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all details or all facts of which I am aware relating to this investigation.

3. I am currently investigating JESSE THEODORE MCFADDEN, date of birth XX/XX/1950, for violations of federal law, including a violation of 18 U.S.C. § 922(g)(1) (felon in possession of firearms).

4. On May 17, 2020, at approximately 0800 hours, Arenac County, Dispatch received a 911 call from MCFADDEN where he reported to be enroute to the United States Coast Guard Station in Bay City, MI, to steal a helicopter to further

his plan to attack a police station and shoot up a local hospital. MCFADDEN told the dispatcher that he wanted to disrupt the power to the hospital, unlock the doors, and release patients under COVID-19 quarantine. MCFADDEN also told the dispatcher he was armed with a machinegun. In response, Arenac County Dispatch notified area law enforcement agencies and Coast Guard Station Saginaw River of the threat, along with a brief criminal history related to MCFADDEN brandishing weapons and resisting police.

5. At approximately 1030 hours, Coast Guard personnel at the Saginaw River Coast Guard Station in Essexville, Michigan contacted Bay County Dispatch to report MCFADDEN had arrived at the Coast Guard Station and attempted to gain access by utilizing the gate keypad. MCFADDEN arrived in a black Ford open bed pick-up truck registered to another person. After several failed attempts to enter with an access code, MCFADDEN called the station communications center and demanded access. Coast Guard personnel denied his requests for access. MCFADDEN continued to demand access, and threaten to ram the gate open with his truck. At approximately 1039 hours, MCFADDEN departed Coast Guard Station before Essexville Police arrived.

6. At approximately 1115 hours, after describing MCFADDEN's truck to Essexville Police, his parked truck was discovered by a Michigan State Police (MSP)

Trooper at a gas station located in Essexville. The vehicle was unoccupied, running with the driver's door open. As MCFADDEN exited the gas station, the MSP Trooper made contact with him. As MCFADDEN and the Trooper spoke, a Hampton Township police officer secured MCFADDEN's vehicle. As the Trooper and other police officers continued to talk with MCFADDEN, a Hampton Township officer located a Mossberg Model 500A 12 gauge shotgun bearing S/N: L714046 on the passenger seat of MCFADDEN's truck. The shotgun was loaded with five shells.

7. When MCFADDEN saw that the Hampton police officer had seized the shotgun, he attempted to hit the MSP Trooper, disobeyed the officers' verbal commands, and resisted officers' attempts to place him under arrest. Ultimately officers used a taser on MCFADDEN and arrested him. MCFADDEN was taken into custody by the Hampton Township Police Department.


8. As part of my investigation, I reviewed MCFADDEN's criminal history. On June 15, 2011, in the 23<sup>rd</sup> Circuit Court of Michigan, MCFADDEN was convicted of fleeing and eluding fourth degree, which is a felony punishable by two years of imprisonment.

9. I have spoken with ATF Special Agent Jonathan Wickwire, who is recognized by ATF as having expertise in the interstate travel and manufacture of firearms. SA Wickwire advised me that the Mossberg Model 500A 12 gauge bearing

S/N: L714046 was manufactured outside of the state of Michigan and is a firearm as defined in Chapter 44, Title 18, United States Code.

10. Based on the foregoing, I have probable cause to believe that on May 17, 2020, in the Eastern District of Michigan, JESSE MCFADDEN, knowing that he had been convicted of a felony offense punishable by a term of imprisonment exceeding one year, knowingly possessed, in and affecting commerce, a firearm in violation of 18 U.S.C. § 922(g)(1).

Dated May 20, 2020.

  
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Travis Forfinski  
Special Agent  
U.S. Coast Guard Investigative Service

Sworn to before me and signed in my presence and/or by reliable electronic means  
on May 20, 2020.



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HON. PATRICIA T. MORRIS  
UNITED STATES MAGISTRATE JUDGE